

1 James J. Pisanelli, Esq., Bar No. 4027  
[JJP@pisanellibice.com](mailto:JJP@pisanellibice.com)  
 2 Jarrod L. Rickard, Esq., Bar No. 10203  
[JLR@pisanellibice.com](mailto:JLR@pisanellibice.com)  
 3 PISANELLI BICE PLLC  
 4 400 South 7th Street, Suite 300  
 5 Las Vegas, Nevada 89101  
 Telephone: 702.214.2100  
 Facsimile: 702.214.2101

6 *Attorneys for Defendant Bailey Peavy Bailey, PLLC*

7 **UNITED STATES DISTRICT COURT**

8 **DISTRICT OF NEVADA**

9 BLUE ACQUISITION MEMBER, LLC,

Case No. 2:14-cv-02013-GMN-NJK

10 Plaintiff,

**STIPULATION AND  
 ORDER REGARDING DEFENDANT'S  
 DEADLINE TO FILE REPLY IN  
 SUPPORT OF MOTION TO DISMISS**

11 vs.

12 BAILEY PEAVY BAILEY, PLLC,

**(First Request)**

13 Defendant.

14  
 15 Defendant Bailey Peavy Bailey, PLLC ("Bailey Peavy"), by and through its undersigned  
 16 counsel, and Plaintiff Blue Acquisition Member, LLC ("Blue Acquisition"), by and through its  
 17 counsel, hereby state as follows:

18 1. Bailey Peavy filed a Motion to Dismiss for Lack of Personal Jurisdiction or  
 19 Alternatively Motion to Transfer Venue or Enter a Stay ("Motion to Dismiss") on  
 20 April 24, 2015 (Doc. 32);  
 21 2. Blue Acquisition filed a Response to Bailey Peavy's Motion to Dismiss and  
 22 Countermotion for Jurisdictional Discovery on May 26, 2015 (Doc. 38);  
 23 3. The deadline for Bailey Peavy's Reply In Support of its Motion to Dismiss is June  
 24 5, 2015;  
 25 4. The deadline for Bailey Peavy's Opposition to Blue Acquisition's Countermotion  
 26 for Jurisdictional Discovery is June 12, 2015;

PISANELLI BICE  
 400 SOUTH 7TH STREET, SUITE 300  
 LAS VEGAS, NEVADA 89101

1           5. Bailey Peavy's counsel requested and Blue Acquisition agreed that the deadline for  
2           Bailey Peavy's Reply in Support of its Motion to Dismiss shall be continued to  
3           June 12, 2015, so that Bailey Peavy may file only one brief.

4           In light of the foregoing, the Parties STIPULATE AND AGREE, subject to this Court's  
5           approval, as follows:

6           1. That the deadline for Bailey Peavy's Reply In Support of its Motion to Dismiss  
7           (Doc. 32) shall be continued to June 12, 2015;  
8           2. Blue Acquisition shall have until June 22, 2015, to file its Reply In Support of  
9           Countermotion for Jurisdictional Discovery (Doc. 38).

10           DATED this 1st day of June 2015

11           HOLLEY, DRIGGS, WALCH, PUZEY  
12           & THOMPSON

PISANELLI BICE PLLC

13           By: /s/ F. Thomas Edwards  
14           F. Thomas Edwards, Esq., #9549  
15           Sarah T. Bassett, Esq., #12326  
16           400 South Fourth Street, Third Floor  
17           Las Vegas, Nevada 89101

18           Attorneys for Plaintiff

13           By: /s/ Jarrod L. Rickard  
14           James J. Pisaneli, Esq., #4027  
15           Debra L. Spinelli, Esq., #9695  
16           Jarrod L. Rickard, Esq., #10203  
17           400 South 7th Street, Suite 300  
18           Las Vegas, Nevada 89101

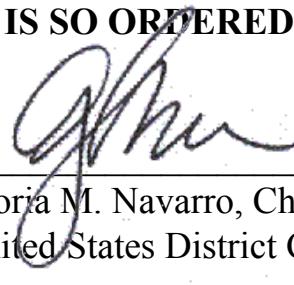
19           Attorneys for Defendant

**ORDER**

20           IT IS SO ORDERED that:

21           3. That the deadline for Bailey Peavy's Reply In Support of its Motion to Dismiss  
22           (Doc. 32) shall be continued to June 12, 2015;  
23           4. Blue Acquisition shall have until June 22, 2015, to file its Reply In Support of  
24           Countermotion for Jurisdictional Discovery (Doc. 38).

25           **IT IS SO ORDERED.**

26  
27             
28           Gloria M. Navarro, Chief Judge  
                  United States District Court

**DATED: 06/02/2015**